

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

MICHAEL COHEN,

Plaintiff,

v.

BEAN LLC, d/b/a FUSION GPS, and  
GLENN SIMPSON,

Defendants.

Case No. 1:18-cv-00183-JPO

**DECLARATION OF SHAWN P. NAUNTON IN SUPPORT  
OF DEFENDANTS' MOTION TO DISMISS THE COMPLAINT**

SHAWN P. NAUNTON, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am a member of the Bar of this Court and a partner of the firm Zuckerman Spaeder LLP, counsel for Defendants in this action. I submit this declaration in support of Defendants' motion to dismiss the complaint.

2. I also submit this declaration to place before the Court true and correct copies of the following documents:

Exhibit 1              Memorandum of Points and Authorities in Support of Non-Party Fusion GPS's Motion to Quash Subpoena or, in the Alternative, for a Protective Order, in the action *In Re Third Party Subpoena to Fusion GPS*, No. 1:17-mc-01271 (D. D.C. Aug. 31, 2017).

Exhibit 2              Corrected Reply in Support of Non-Party Fusion GPS's Motion to Quash Subpoena or, in the Alternative, for a Protective Order, in the action *In Re Third Party Subpoena to Fusion GPS*, No. 1:17-mc-01271 (D. D.C. Oct. 27, 2017).

Exhibit 3              Complaint in the action *Cohen v. Buzzfeed*, No. 150231/2018 (Sup. Ct. N.Y. Jan. 9, 2018).

Exhibit 4

Company Intelligence Reports 2016/134 (18 October 2016),  
2016/135 (19 October 2016), 2016/136 (20 October 2016), and  
2016/166 (13 December 2016).

3. I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 30, 2018  
New York, New York

s/ *Shawn P. Naunton*  
Shawn P. Naunton  
ZUCKERMAN SPAEDER LLP